

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

COMMON CAUSE RHODE ISLAND, LEAGUE OF
WOMEN VOTERS OF RHODE ISLAND, MIRANDA
OAKLEY, BARBARA MONAHAN, and MARY
BAKER,

Plaintiffs,

- against -

NELLIE M. GORBEA, in her official capacity as Secretary
of State of Rhode Island; DIANE C. MEDEROS, LOUIS
A. DESIMONE JR., JENNIFER L. JOHNSON,
RICHARD H. PIERCE, ISADORE S. RAMOS, DAVID
H. SHOLES, and WILLIAM E. WEST, in their official
capacity as members of the Rhode Island Board of
Elections,

Defendants.

Case No. 1:20-cv-00318-MSM-
LDA

JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT AND DECREE

Plaintiffs and Defendants (collectively, the “Parties”) seek approval of a consent judgment and decree that would vindicate the public interests of ensuring access to the ballot, protecting election integrity, and promoting public health during the COVID-19 pandemic. Specifically, the agreement would stop enforcement for the September 8, 2020 primary and November 3, 2020 general elections of the requirement that Rhode Island voters eligible to vote by mail, subject to very limited exclusions, sign the certifying envelopes which contain their ballots before a notary public or two witnesses in order for their votes to be counted. In support of their motion, the Parties rely upon the attached proposed Consent Judgment and Decree.

This agreement represents a fair, adequate, and reasonable arrangement that will benefit all parties while serving the public interest. The Parties therefore request that the Court enter this agreement, which will provide certainty well in advance of the September 8, 2020 primary and

November 3, 2020 general elections while allowing all qualified Rhode Islanders to vote and protect their health.

Dated: July 27, 2020

Respectfully submitted,

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CERTIFICATION

I certify that on July 27, 2020, I served a copy of the within documents via the Court's CMECF system, which sent copies of this document to Counsel of Record.

/s/ Lynette Labinger
Lynette Labinger, Esq.